

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

S B ICE, LLC,

Plaintiff,

- against -

MGN, LLC d/b/a TOUCH, MUHAMET NIKEZI,
and NAIM NEZAJ,

Defendants.

08 CV 03161 (DLC)

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

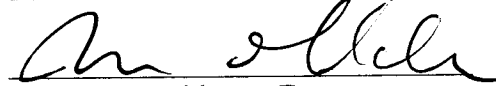
PLEASE TAKE NOTICE that pursuant to Rule 1.3(c) of the Local Rules of this Court, and upon the annexed Declaration of Rachel B. Goldman, dated April 16, 2008, including the exhibits attached thereto, and upon all prior papers, pleadings, and proceedings had and filed herein, the undersigned will move this Court, before the Honorable Denise L. Cote, United States District Judge, United States Courthouse, 500 Pearl Street, Courtroom 11B, New York, New York 10007, at a date and time to be determined by the Court, for an Order admitting Michael I. Santucci, Esq., *pro hac vice*, as counsel for plaintiff, S B ICE, LLC, for the purposes of the above-captioned case.

Dated: New York, New York
April 16, 2008

Respectfully Submitted,

BRACEWELL & GIULIANI, LLP

By:



Rachel B. Goldman, Esq.
1177 Avenue of the Americas
New York, New York 10036-2714
212-508-6135 (telephone)
212-938-3835 (facsimile)

Attorneys for Plaintiff, S B ICE, LLC

APR 18 2008

92-648609

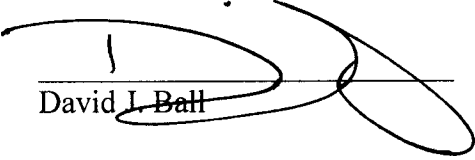
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
2008 APR 18 11 32 AM

AFFIRMATION OF SERVICE

DAVID J. BALL, an attorney admitted to practice before the United States District Court of the Southern District of New York, affirms, pursuant to Fed. R. Civ. P. 5 and subject to the penalties of perjury, that on the 18th day of April, 2008, I served upon Defendants' Counsel, Plaintiff's **Notice Of Motion To Admit Counsel Pro Hac Vice** and the accompanying **Declaration of Rachel B. Goldman in Support of Motion to Admit Counsel Pro Hac Vice** by sending a copy of said document via regular mail to:

Glenn A. Wolther
Attorney At Law
305 Broadway, Suite 1102
New York, New York 10007

Dated: New York, New York
April 18, 2008


David J. Ball

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

S B ICE, LLC,

Plaintiff,

No. 08 CV 03161 (DLC)

- against -

MGN, LLC d/b/a TOUCH, MUHAMET NIKEZI,
and NAIM NEZAJ,

**[PROPOSED] ORDER FOR
ADMISSION PRO HAC VICE**

Defendants.

-----X

This motion for admission *pro hac vice* in the above-captioned matter is GRANTED. The admitted attorney, Michael I. Santucci, is permitted to argue or try this particular case in whole or in part as counsel of record or advocate.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing the discipline of attorneys.

As the above-captioned action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall immediately forward the \$25.00 *pro hac vice* fee to the Clerk of the Court.

Dated: _____

United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
S B ICE, LLC,

Plaintiff,

- against -

MGN, LLC d/b/a TOUCH, MUHAMET NIKEZI,
and NAIM NEZAJ,

Defendants.
-----X

No. 08 CV 03161 (DLC)

**DECLARATION OF
RACHEL B. GOLDMAN IN
SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

RACHEL B. GOLDMAN declares, under penalty of perjury, the following:

1. I am a member in good standing of the Bar of this Court and counsel at the firm Bracewell & Giuliani LLP, attorneys for plaintiff, S B ICE, LLC in the above-captioned action. I submit this declaration in support of S B ICE, LLC's motion, pursuant to Local Civil Rule 1.3(c), to permit Michael I. Santucci, Esq., to appear, *pro hac vice*, as its counsel for the purposes of the above-captioned action.

2. Michael I. Santucci is a partner at Santucci, Priore & Long, LLP in Fort Lauderdale, Florida. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure as well as the Local Rules of this Court.

3. Attached hereto as Exhibit A is the Declaration of Michael I. Santucci In Support of Motion to Admit Counsel *Pro Hac Vice*, dated on April 11, 2008. As stated in Mr. Santucci's declaration, and as evidenced by the Certificate of Good Standing annexed thereto as Exhibit 1, Mr. Santucci is a member in good standing of the State Bar of Florida.

4. S B ICE, LLC respectfully requests that Michael I. Santucci be permitted to appear in this case, *pro hac vice*, as its counsel.

Dated: New York, New York
April 16, 2008



RACHEL B. GOLDMAN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
S B ICE, LLC,

Plaintiff,

- against -

MGN, LLC d/b/a TOUCH, MUHAMET NIKEZI,
and NAIM NEZAJ,

Defendants.
-----X

No. 08 CV 03161 (DLC)


**DECLARATION OF
MICHAEL I. SANTUCCI
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

MICHAEL I. SANTUCCI hereby declares, under the penalty of perjury, the following:

1. I am the Managing Partner of Santucci, Priore & Long, LLP in Fort Lauderdale, Florida.
2. I submit this declaration in support of S B ICE, LLC's application for my admission, *pro hac vice*, to practice before this Court and represent S B ICE, LLC for the purposes of the above-captioned case.
3. As shown in the Certificate of Good Standing annexed hereto as Exhibit 1, I am a member in good standing of the State Bar of Florida.
4. I am not presently, nor have I ever been, suspended, disbarred, or otherwise disciplined in any courts or jurisdictions where I have been admitted to practice. There are no pending disciplinary proceedings against me in any State or Federal court.
5. I have obtained a copy of the Local Rules of the Southern District of New York, and am familiar with those Rules.

6. In connection with the above-captioned action, I hereby consent to be subject to the jurisdiction and rules of the State of New York governing professional misconduct.

Date: Ft. Lauderdale, Florida
April 11, 2008



MICHAEL I. SANTUCCI



The Florida Bar

JOHN F. HARKNESS, JR.
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
WWW.FLORIDABAR.ORG

State of Florida)

County of Leon)

In Re: 105260
Michael Ingrassi Santucci
Silverman Santucci, LLP
500 W. Cypress Creek Rd., Ste. 500
Fort Lauderdale, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on April 16, 1997.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 26th day of March, 2008.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd
Supervisor, Membership Records
The Florida Bar

WMS/smwhh1:R10